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October 27, 2022

**VIA ECF**

Hon. Paul G. Gardephe  
United States District Judge  
United States District Court, SDNY  
Thurgood Marshall United States Courthouse  
40 Foley Square, Room 2204  
New York, NY 10007

**Re: JTH Tax, LLC d/b/a Liberty Tax Service v. AMC Networks, et al.**  
**No: 1:22-cv-06526-PGG, Request for Adjournment of Initial Conference**

Dear Judge Gardephe:

On behalf of Plaintiff JTH Tax, LLC d/b/a Liberty Tax Service (“Plaintiff”), we write to respectfully request an adjournment of the Initial Conference scheduled for November 3, 2022 at 10:15 a.m. We request an adjournment because I will speaking at the ABA Convention in San Diego on that date and as co-lead counsel and the client relationship partner, I would prefer to attend the Initial Conference. We met and conferred with counsel for Defendants AMC Networks Inc. and Sony Pictures Television Inc. and Defendants consent to this request. Counsel for Plaintiff and Defendants are available on November 15, 16, or 18 for the Initial Conference if any of those dates works for the Court.

An adjournment of the Initial Conference is further warranted in light of the fact that Plaintiff intends to amend the Complaint in the next day or so. An adjournment of the Initial Conference will give the Defendants an opportunity to review the Amended Complaint and to determine whether to file another pre-motion letter and also allow time for Plaintiff to respond to another pre-motion letter. If the Court is not inclined to grant this adjournment request, Plaintiff is prepared to have co-lead counsel James Messenger attend the Initial Conference on November 3, 2022, along with partner Clair Wischusen.

This is the first request for an adjournment of the Initial Conference. We thank Your Honor for consideration of this request.

Respectfully yours,

GORDON REES SCULLY MANSUKHANI LLP

  
PETER G. SIACHOS

cc: All Counsel of Record (via ECF)